

TO: Clerk's Office
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK



**APPLICATION FOR LEAVE
TO FILE DOCUMENT UNDER SEAL**

-v.-

Docket Number

SUBMITTED BY: Plaintiff____ Defendant____ DOJ____

Name:_____

Firm Name:_____

Address:_____

Phone Number:_____

E-Mail Address:_____

INDICATE UPON THE PUBLIC DOCKET SHEET: YES NO

If yes, state description of document to be entered on docket sheet:

MANDATORY CERTIFICATION OF SERVICE:

A.) ____ A copy of this application either has been or will be promptly served upon all parties to this action, **B.)** ____ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation:____; or **C.)** ____ This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

DATE

Gil Rein

SIGNATURE

A) If pursuant to a prior Court Order:

Docket Number of Case in Which Entered:_____

Judge/Magistrate Judge:_____

Date Entered:_____

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,
AND MAY NOT BE UNSEALED UNLESS ORDERED BY
THE COURT.**

DATED: August 8, 2022 , NEW YORK

U.S. MAGISTRATE JUDGE *Taryn A. Merkel*

RECEIVED IN CLERK'S OFFICE _____
DATE

JMH:GMR
F. #2022R00612

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

WILLIAM SWIFT,

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

CHAD MACONES, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between February 2022 and June 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant WILLIAM SWIFT, knowingly and intentionally transmitted in interstate and foreign commerce communications containing threats to injure the person of another, to wit: communications threatening serious bodily injury and death to Jane Doe, John Doe-1, John Doe-2, John Doe-3, and John Doe-4, whose identities are known to the deponent.

(Title 18, United States Code, Sections 875(c), 2 and 3551 et seq.)

TO BE FILED UNDER SEAL

**AFFIDAVIT AND
COMPLAINT IN SUPPORT
OF AN APPLICATION FOR
AN ARREST WARRANT**

(18 U.S.C. §§ 875(c), 2 and 3551 et seq.)

Case No. 22-MJ-846

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been for twelve years. I have been assigned to the Joint Terrorism Task Force since 2015, where my duties include international and domestic terrorism and threat response. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. In June 2022, the FBI learned that, over the preceding months, the defendant WILLIAM SWIFT had directed threats of violence at the Woodstock Fruit Festival ("WFF" or "the festival"), a health and wellness event, which is scheduled to occur in Diamond Point, New York in late August 2022. These threats included stabbing specific people, orchestrating a mass shooting, and harming people at the festival if it was not cancelled.²

3. At all relevant times, the defendant WILLIAM SWIFT has resided at 331 Alabama Avenue, Brooklyn, New York in the Eastern District of New York.

4. On or about February 21, 2022, Jane Doe received an email from the defendant WILLIAM SWIFT via the defendant's Gmail.com email account (the "Gmail Account"), which stated in sum and substance that Jane Doe should not allow John Doe-1 and John Doe-2 to attend the festival. SWIFT also sent several audio recorded messages via the

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

² In July 2022, the defendant WILLIAM SWIFT emailed Jane Doe and stated: "I'm sorry I said such hateful and threatening things to you and the people at WFF.... I will not harm anyone at WFF."

Gmail Account and other electronic messaging services to Individual-1, as well as to others associated with the WFF who then provided them to Individual-1. In some of these messages, SWIFT stated the following:

- “[John Doe-2, John Doe-1, and John Doe 3] and the fat whores, yeah none of them can go to Woodstock, if I see them at Woodstock online I’ll go to Woodstock with a gun and just shoot them or whoever else is in my way...not you, I’ll never shoot you, yet.”
- “I hope they all do come so I get to go up and shoot everyone.”
- “The ideal thing would be to go up to Woodstock to shoot up...the Jewish meet up. That would be ideal.”
- “Don’t be surprised, when I shoot up Woodstock, when I see those people there. [John Doe-3, John Doe-2, John Doe-1].

5. On or about June 12, 2022, Jane Doe received an email from the defendant WILLIAM SWIFT via the Gmail Account which stated in part: “[I]f WFF happens this year, I will be there with my legal pocketknife, and I will be showing people how it works....”

6. On or about June 12, 2022, the defendant WILLIAM SWIFT sent an audio recording to Jane Doe via the Gmail Account. In this audio recording, among other things, SWIFT stated “I will be at the bus stop, and I will be there with a knife, that’s legal to carry, and if I don’t see the bus I’ll go to Woodstock myself, with a knife, that’s legal to carry...I’m not afraid of the police, I could have stabbed you in Woodstock 2013, I’d be so much healthier if I just spent the last ten years in jail....” The message further stated in sum and substance that Jane Doe should cancel the festival if she does not want “this stuff to happen.”

7. On or about June 18, 2022, the defendant WILLIAM SWIFT sent an audio recording to Jane Doe via the Gmail Account which stated in part: “I’m sorry to say this but I can’t stop fantasizing about doing very, very, very bad things to you, I don’t have a plan I just fantasize about doing very, very bad things to you....” The audio recording further stated in sum and substance that SWIFT fantasized about “doing a fucking Ted Bundy” to Jane Doe because he told Jane Doe to shut down the festival and Jane Doe did not comply.

8. On or about May 17, 2022, John Doe-2, an individual associated with the WFF, received a threatening email from the defendant WILLIAM SWIFT via the Gmail Account which stated “[H]ey piece of shit bitch, I want to make something clear, WFF is over. [John Doe-1’s] retreats are over whether you like it or not. [I]f I see you, you will regret coming to NYC, and you will feel my pain.” SWIFT later sent another email which stated “[I] want to make something clear. You or [John Doe-1] will be harmed immesnaely [sic] if seen in NYC.”

9. On or about May 18, 2022, John Doe-4, a former festival presenter, received a threatening email from the defendant WILLIAM SWIFT via the Gmail Account. The email stated in part: “Hey [John Doe-4], this is William Swift from WFF. IF [sic] you attend WFF again, I’m going to end your life for sure. I hate you and [John Doe-1] and view this as a death cult and if I see you at WFF I will aim for you and your friends or your woman but mainly you.”

10. I have reviewed records, including Internet Protocol “IP” activity logs provided by Google, Inc., for the Gmail Account around the time of the communications from the defendant WILLIAM SWIFT described above. After entering several of the IP addresses connected with the Gmail Account into publicly available databases, I observed that the addresses are associated with locations in the Eastern District of New York.


WHEREFORE, your deponent respectfully requests an arrest warrant so that the defendant WILLIAM SWIFT may be dealt with according to law.

It is further requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant except that the undersigned will distribute copies of this charging document and any resulting arrest warrant to other law enforcement authorities as necessary to effectuate the defendant's arrest. Based on my training and experience, I have learned that criminals actively search for criminal affidavits and arrests warrants via the internet. Although I have reason to believe the defendant WILLIAM SWIFT may be aware of the FBI's interest in his activities, I believe he is unaware of the full extent of the investigation into his violations of federal law. Further, SWIFT stated to a person associated with the WFF that if he was arrested, he would kill Jane Doe. Therefore, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving SWIFT an opportunity to flee, destroy or tamper with evidence, intimidate witnesses or change patterns of behavior.



CHAD MACONES
Special Agent, Federal Bureau of Investigation

Sworn to before me by telephone this
8th day of August, 2022



THE HONORABLE TARYN A. MERKL
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America

v.

WILLIAM SWIFT

Case No. 22-MJ-846

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) WILLIAM SWIFT,
 who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Title 18, United States Code, Section 875(c) - (Transmission of Threats in Interstate Commerce)

Date: August 8, 2022

Taryn A. Merkl
 Issuing officer's signature

City and state: Brooklyn, New York

Hon. Taryn A. Merkl, U.S.M.J.
 Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

 Arresting officer's signature

 Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____